

COUNCIL FOR NATURE CONSERVATION AND THE COUNTRYSIDE

Genetically Modified Organisms, Other Novel Crops And the Ecology of Northern Ireland

CNCC OBSERVATIONS AND RECOMMENDATIONS PAPER

1. GENERAL

- 1.1 Genetically Modified Organisms (GMOs) developments have generated considerable debate and raised a range of economic, ethical and ecological concerns and responses at Global, European and National UK levels. Council for Nature Conservation and the Countryside (CNCC), while acknowledging the importance of economic and ethical aspects of the debate must limit its consideration to the environmental implications with a focus, in line with its remit, on how the ecology of the Northern Ireland countryside and coastal waters might best be protected from (or indeed advantaged by) GMOs.
- 1.2 In considering its position, CNCC acknowledges and has regard to relevant EU and National Regulations, to the Government's March 2004 Response to the GM Dialogue as well as to advisory roles of specialist bodies such as the Advisory Committee on Releases to the Environment (ACRE). The Council also notes and concurs with the content of the Joint Nature for Conservation Council's (JNCC) position statement on GMOs in the UK. However, it considers that there is scope for CNCC to supplement the JNCC Paper with a regional focus statement.

2. NORTHERN IRELAND – REGIONAL FACTORS

- 2.1 The existing pattern of agriculture in Northern Ireland with limited arable production and a preponderance of grass based livestock farming suggests that adoption of GMO "broad acre" crops entailing resistance to herbicides is unlikely to pose significant scale threat (or benefit) to local biodiversity. However, to judge the potential for GMOs in Northern Ireland in such narrow terms might be somewhat complacent. The range and rate of increase in GMO research allied to the opportunities for alternative land use created by CAP de-coupling present uncertainties as to future GMO use in Northern Ireland. To this uncertainty can be added local pressure or need to minimise the disadvantage which peripherally presents as well as more general responses involving GMOs to climate change, sustainable farming and energy related industrial crops. All of these create potential for application of GMOs in Northern Ireland.
- 2.2 The ability to develop and maintain such vigilance and appropriate response mechanisms is perhaps reduced by resource pressures. These are exacerbated by the relatively small scale of the resources potentially available for local GMO monitoring, research and administration.
- 2.3 The relatively small size of fields in Northern Ireland when compared with 'prairie' scale cropping is of relevance in the context, for example, of airborne GMO pollen drift impact on organic farming. The scope for buffering is virtually non-existent. The Council is supportive of

organic farming and would be concerned to ensure that GMO developments do not militate against existing OF operation nor deter expansion of that type of farming. Similar sentiments apply to any environmentally beneficial 'low input – low output' farming which may already exist or may develop.

- 2.4 The principal difference between Northern Ireland and GB in regard to GMOs is the international dimension created by the land frontier with Republic of Ireland. While transfrontier issues, relating to Member States are largely catered for by EU Regulations, harmonisation of approach to the use of GMOs between Member States is not a requirement. It will therefore be vital to ensure formal and functional arrangements between Northern Ireland and Republic of Ireland covering all GMO based activity whether related to food crops, non-food crops, fish, insects, trees or whatever. This will need to address co-existence and liability particularly from the environmental damage aspect.

3.0 RECOMMENDATIONS

- 3.1 CNCC, having considered existing and developing arrangements for GMO approvals and control at UK level which in turn reflect EU Regulations, suggests that the emphasis in Northern Ireland should be on a case by case approach with vigilance regarding development and introduction of new products and reflecting the 'Precautionary Principle'. It therefore recommends the following actions to reflect the Northern Ireland regional perspective:

- DOE must ensure appropriate environmental input to all UK deliberations on GMO approvals and GMO policy in order to guarantee due regard is had to relevant and unique Northern Ireland circumstances. DOE should also ensure that unique Northern Ireland circumstances are fully addressed using available Northern Ireland legislation and Ministerial discretion;
- DOE should adopt a precautionary approach and notwithstanding current uncertainty above the likely scale, nature and timing of GMO activity within Northern Ireland should establish an optimum monitoring and response regime. While this type of regime is required under NI Regulations governing locally approved GMO releases, it should exist to deal with GMO releases approved elsewhere including those approved by Republic of Ireland authorities and delivered on the ground in any of the border counties of Republic of Ireland or in the coastal waters thereof.
- DOE must pursue and ensure mutually beneficial formal and effective liaison arrangements with the appropriate authorities in ROI which should deliver transparency in relation to GMO developments either side of the land frontier including monitoring of approved releases;
- GMO development and use often gives rise to strong response emotions from supporters and opponents alike. Confusion can exist in the minds of the public at large due to a lack of transparency regarding the issues. To this background it might be helpful if DOE provided some form of publicly accessible real time information which could serve to leave the public better placed to make informed decisions regarding GMOs.

4.0 A WIDER PERSPECTIVE

CNCC acknowledges the current focus on GMO development and the potential risk presented to biodiversity. However it is concerned lest this focus should cause the wider picture of the impact of novel crops in general or production systems to be marginalised.

- 4.1 The massive decline in biodiversity related to agricultural production in recent years, has not been as a result of GM technology but reflects modifications in agricultural production facilitated by conventional breeding and chemical usage, with no subsequent monitoring. Many of the effects have been indirect. Non-target species were either starved to death or eliminated as a consequence of increasingly efficient farming methods;
- 4.2 A few examples of recent developments in Northern Ireland are the increased use of maize made possible from conventional breeding, a switch towards high genetic merit dairy cows, and the recent trend towards willow growing. If any of these involved GM technology their impact would be monitored yet we appear not to know what, if any, affect these changes have had or will have on biodiversity/water quality;
- 4.3 CNCC recommends that DOE in liaison with DARD should establish a monitoring regime to evaluate the environmental impact of the growing and use of new crops and of new agricultural methods. This approach would contribute to the delivery of the Strategic Environmental Assessment (SEA) Directive in Northern Ireland.